

**BAKER & HOSTETLER LLP**  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
[dsheehan@bakerlaw.com](mailto:dsheehan@bakerlaw.com)  
Marc Hirschfield  
[mhirschfield@bakerlaw.com](mailto:mhirschfield@bakerlaw.com)  
Judith A. Selby  
[jselby@bakerlaw.com](mailto:jselby@bakerlaw.com)

Presentment Date: February 10, 2011, at 12:00 p.m. (ET)  
Objection Deadline: February 10, 2011, at 11:00 a.m. (ET)

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L.  
Madoff*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

**NOTICE OF PRESENTMENT OF REVISED PROPOSED ORDER**

**PLEASE TAKE NOTICE** that an amended proposed order granting the relief sought by the motion to establish procedures for serving sealed complaints and exhibits dated January 11, 2011 [Dkt. No. 3670] (the “Motion”) of Irving H. Picard (the “Trustee”), as trustee for the

liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff (“Madoff”, and together with BLMIS, the “Debtors”), by and through his undersigned counsel, in the SIPA Liquidation filed in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), pursuant to, *inter alia*, the Amended Global Protective Order entered by this Court on November 10, 2010, will be presented to the Honorable Burton R. Lifland for signature on **February 10, 2011, at 12:00 noon.**

**PLEASE TAKE FURTHER NOTICE** that the Motion, along with a proposed order granting the relief sought in the Motion, were filed on January 11, 2011, with the Court.

**PLEASE TAKE FURTHER NOTICE** that changes have been made to the proposed order and attached to this Notice are the amended proposed order (attached hereto as exhibit A) and a cumulative comparison (attached hereto as exhibit B).

**PLEASE TAKE FURTHER NOTICE** that any response or objection to the amended proposed order must be filed with the Bankruptcy Court and served upon: (i) the Chambers of the Honorable Burton R. Lifland, One Bowling Green, New York, New York 10004; (ii) Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq., Marc Hirschfield, Esq., and Judith A. Selby, Esq.; (iii) Securities Investor Protection Corporation, 805 Fifteenth Street, N.W., Suite 800, Washington, D.C. 20005, Attn: Kevin H. Bell, Esq., on or before **February 10, 2011, at 11:00 a.m. (the “Objection Deadline”)**.

**PLEASE TAKE FURTHER NOTICE** that, if an objection to the amended proposed order is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

**PLEASE TAKE FURTHER NOTICE** that, if an objection to the amended proposed order is filed, a hearing may be held before the Honorable Burton R. Lifland, United States Bankruptcy Judge, at a date to be scheduled by the Court, upon such additional notice as the Court may direct. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: New York, New York  
February 2, 2011

BAKER & HOSTETLER LLP

By: /s/ Marc E. Hirschfield  
David J. Sheehan  
Marc E. Hirschfield  
Judith A. Selby

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and Bernard L. Madoff*